IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

YOSHIDA METAL INDUSTRY CO., LTD.)		65
)		(
Opposer,)		
)	Opposition No. 91/156,618	<u></u>
V.)	Appln. Serial No.: 76/179,674	:
)	Mark: GLOBAL DECOR	Ŝ.
GLOBAL DECOR, INC.)		(5)
)		
Applicant.)		

<u>APPLICANT'S MOTION TO ENTER PROTECTIVE ORDER</u>

Applicant moves that the Trademark Trial and Appeal Board enter the attached protective order (Exhibit 1). Applicant needs the protective order to prevent Opposer from DISCLOSING confidential information. The Rules specifically provide for entry of a protective order upon motion. See Rule 2.120(f). Opposer has sought a multitude of specifics on how Applicant markets and sells products associated with its mark. While Applicant disagrees that Opposer is entitled to such over broad discovery, See CBS v. Morrow, 708 F 2nd 1579, 218 USPQ2nd 198 (Fed. Cir. 1983); Cunningham v. Laser Golf 222 F 3rd. 943(Fed. Cir. 2000), assuming an accord can be reached concerning Applicant's Objections to the discovery, Applicant will need a protective order.

09-11-2003

U.S. Patent & TMOfc/TM Mail Rcpt Dt. #22

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Applicant's Motion Enter Protective Order has been served on the below-named attorneys, via U.S. mail, by The undersigned hereby certifies that a copy of the foregoing Applicant's Motion to depositing same in the U.S. mail chute at One North Wacker Drive, Chicago, Illinois 60606, with proper postage prepaid, on this 5th day of September, 2003

> Jeffrey H. Kaufman, Esq. Amy C. Sullivan, Esq. Oblon, Spivak, McClelland, Maier & Neustadt, P.C. 1940 Duke Street Alexandria, Virginia 22314

CERTIFICATE OF MAILING

I hereby certify that the attached correspondence is being deposited with the United States Postal Service as first class mail in an envelope with sufficient postage addressed to:

> **BOX - TTAB** Commissioner for Trademarks 2900 Crystal Drive Arlington, Virginia 22202-3513

on this 5th day of September, 2003.